

EPA REG. No 81433-2 Vol. 2

Material to be added to a Mini-Jacket (in the case where an e-Jacket exists)

Reg. No. 81433-2

Send to SIG: check box ☒

This material is:

- ☒ New stamped-accepted label
- ☐ New CSF
- ☐ Notification
- ☐ Final Printed Label
- ☐ Other: _____

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Kable Bo Davis

Phone: 703 306-0415 Division: RD

Date: 3-29-06



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Isaac Shapiro
IMS Trading, LLC
12906 Telegraph Road
Santa Fe Springs, CA 90670

MAR 29 2006

Dear Mr. Shapiro:

Subject: Labeling Amendment; Corrected Percentage of Active Ingredient
IMS Moth Balls
EPA Registration No. 81433-2
Submission Date: March 15, 2006

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact Kable Bo Davis at (703) 306-0415.

Sincerely yours,

Daniel C. Kenny
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)

MAR 29 2006

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 81433-2



MOTH BALLS



MOTH BALLS



MOTH BALLS

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING:

Causes eye, skin, and respiratory tract irritation. Harmful if swallowed. Avoid contact with skin, eyes, or clothing. Physical-Chemical Hazard. Combustible. Do not use or store near heat or open flame.

FIRST AID

If Swallowed	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on Skin or Clothing	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If Irritated	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
If in Eyes	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

STORAGE AND DISPOSAL

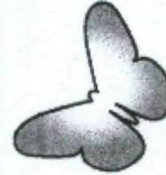
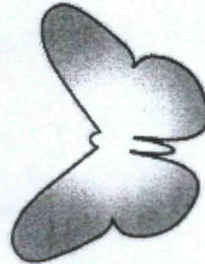
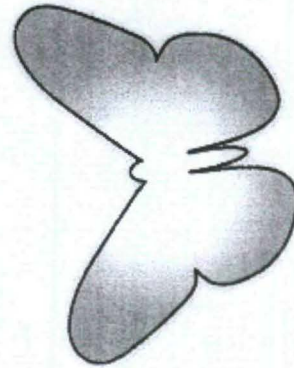
Do not reuse empty box or cellophane. Wrap container and put in trash.

NOTICE:

California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

EPA Reg. No. 81433-2
EPA Est. 81217-CHN-001

MADE IN CHINA



★ **KILLS MOTHS & CARPET BEETLES** ★

★ **NO CLINGING ODOR PROTECTS CLOTHING** ★

WHEN USED IN AIR-TIGHT CONTAINERS THIS PRODUCT CAN TREAT UP TO 29 CU. FT.

KEEP OUT OF REACH OF CHILDREN.

WARNING: SEE SIDE AND BACK PANEL FOR ADDITIONAL PRECAUTIONS.

INGREDIENT STATEMENT
ACTIVE INGREDIENT: PARADICHLOROBENZENE 99.5%
INERT INGREDIENTS: 0.5%
TOTAL: 100%

NET WT. 5 OZ. (141.75g)

INSTRUCTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with labeling.

Thoroughly brush or clean articles to be stored. Use at rate of 1 bag (5 oz.) for each 29 cubic ft. of tightly enclosed space. Distribute IMS Moth Balls evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with 1/2 S Moth Balls.

IMS Moth Balls will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene Moth Balls should not be mixed or placed in contact with Naphthalene Moth Balls or Flakes.

Do not use in plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.



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DISTRIBUTED BY:
IMS TRADING, LLC.
LOS ANGELES, CA



 United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 81433-2		2. EPA Product Manager Dan Kenny	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMS Moth Balls		PM# 01	
5. Name and Address of Applicant (Include ZIP Code) IMS Trading, LLC 12906 Telegraph Road Santa Fe Springs, CA 90670 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section - II			
<input checked="" type="checkbox"/> Amendment - Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	
<input type="checkbox"/> Resubmission in response to Agency letter dated _____		<input type="checkbox"/> "Me Too" Application.	
<input type="checkbox"/> Notification - Explain below.		<input type="checkbox"/> Other - Explain below.	
Explanation: Use additional page(s) if necessary. (For section I and Section II.) The accompanying label is identical to the final printed label submitted to EPA in June 2005 except for the absence of color and graphics. IMS requests EPA to stamp this label to expedite registration review in California, as explained in the accompanying letter.			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt. _____ No. per container _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container _____	5. Location of Label Directions <input type="checkbox"/> _____
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Isaac Shapiro		Title Owner/President	Telephone No. (Include Area Code) (562) 903-2623
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Owner/President	
4. Typed Name Isaac Shapiro		5. Date March 15, 2006	



The Acta Group, L.L.C.

1203 Nineteenth Street, N.W. • Suite 300 • Washington, D.C. 20036
Tel: 202/266-5020 • Fax: 202/557-3836
www.actagroup.com

March 15, 2006

Via Hand Delivery

Mr. K. Bo Davis
U.S. Environmental Protection Agency
Office of Pesticide Programs (MC 7505C)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Minor Amendments for 81433-2, 81433-3, 81433-4, and 81433-5

Dear Mr. Davis:

Following our conversations, The Acta Group, L.L.C. (Acta) is submitting on behalf of IMS Trading, LLC (IMS) requests for minor amendments to IMS end-use product registrations 81433-2, 81433-3, 81433-4, and 81433-5. Accompanying this letter are completed forms 8570-1 and labels for each registration. As discussed, these amendment requests are prompted by comments from a state reviewer on the pending registration applications for these products in California, as further explained below. The labels accompanying these minor amendment applications are identical to those submitted to the U.S. Environmental Protection Agency (EPA) in June 2005 as final versions of the registered product labels, with the limited exception that the color and artwork have been removed from the attached versions. IMS requests that EPA review and stamp as accepted the attached labels so that they can be used to complete the California registration process.

IMS recently submitted applications to register the above-listed products in California. During the review process, the California reviewer identified differences between the labels IMS submitted and the EPA-approved stamped labels. The labels submitted to California were the same as the labels submitted to EPA in June 2005, which were final labels revised according to EPA's comments on the approved labels. IMS believes California should accept the labels as submitted, for the reasons given below, but understands from California that acceptance will be more straightforward if EPA stamps the final labels.

- The four registered products have identical compositions and confidential statements of formula (CSF), and differ only in the physical shape into which they are molded. In its comments on 81433-2, EPA directed IMS to change the active ingredient (AI) concentration on the label from 99.6% to 99.8%, which is the nominal concentration on the CSF. As the four

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Mr. K. Bo Davis

March 15, 2006

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registered products are identical in composition, IMS made this change to all four labels without realizing that EPA's comment to make this change was omitted from the acceptance letters for the other three products. As the products and CSFs are all the same, each label should list AI content as 99.8%, and the labels submitted to EPA in June 2005 do so, but California will not accept these labels without new stamped labels from EPA that clarify that this change should have been made to each of the product labels.

- IMS changed the package size for its IMS Moth Balls product, 81433-2, from 7-oz. to 5-oz. and 10-oz. packages. According to Pesticide Registration (PR) Notice 98-10, changes in package size can be made by non-notification. When the package size changed, IMS adjusted the treatment area on the label proportionally. The California reviewer commented that the treatment areas are inconsistent between labels. Upon review, IMS believes the only apparent inconsistency may be due to rounding to whole numbers. One ounce of product treats approximately 5.7 cubic feet (40 divided by 7). Five ounces, therefore, should treat 28.5 (or 29) cubic feet, and 10 ounces, 57 cubic feet.
- California noted the comment "No clinging odor, protects clothing" appears on the front panel of the final labels but not on the stamped labels. Acta believes we discussed this phrase with EPA and determined that it was acceptable to include, given the "no lasting odor" text on certain of the approved labels and the claims elsewhere on the approved labels that the product protects clothing from moths.
- Finally, California requested copies of the label devoid of color and artwork, which do not reproduce well on California's photocopiers and do not transmit well by telefacsimile.

IMS believes EPA reviewed the final labels when they were submitted in June 2005 and found them to incorporate accurately EPA's comments. Accordingly, IMS requests EPA to stamp the attached labels, which are the same as the ones submitted in June 2005 except for the color and artwork, so that IMS can forward them to California to obtain final state approval.



Mr. K. Bo Davis
March 15, 2006
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If you have any questions about these amendment requests, please call me at 202-266-5031.

Sincerely,

A handwritten signature in blue ink that reads "Sheryl Lindros Dolan". The signature is fluid and cursive, with the first name "Sheryl" being more prominent.

Sheryl Lindros Dolan

Attachments